



**Solutia Inc.**  
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July 9, 2001  
(Via certified or express mail)

Kevin Turner-Environmental Scientist, OSC  
U. S. Environmental Protection Agency  
c/o Crab Orchard National Wildlife Refuge  
8588 Rt. 148  
Marion, IL 62959

Thomas Martin  
Associate Regional Counsel  
77 West Jackson Boulevard (C-14J)  
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)**  
**Sediment / Soils Removal Action**  
• **# 2 - July 2001 Monthly Report**

Dear Mr. Turner and Mr. Martin,

Enclosed is the June 2001 Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") sediment removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,

D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

cc:

Mike McAteer - USEPA Region 5  
S. Bron - IEPA  
Mayor D. Reed - Cahokia  
Mayor P. Sauget - Sauget, IL  
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)  
Rich Bartelt - Arcadis

Sauget File - Solutia  
Mike Henry - IDNR  
Kevin de la Bruere - USF&G  
Jon Dikinas - Dikinas Consulting

## **Sauget Sites Area I - Sauget, Illinois**

### **May 31, 2000 UAO – Dead Creek Sediment Removal Action**

#### **Monthly Report**

**Date of Report:** July 9, 2001  
**Period Covered:** June 1, 2001 – June 30, 2001  
**Next Report Period:** July 1, 2001 – July 31, 2001

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#### **Background**

A Unilateral Administrative Order (“UAO”) was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan (“TCRAWP”) was initially submitted to the Agencies June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December, 2000. Bids were received in late January and evaluated in February, 2001.

Fieldwork began on the sediment de-watering phase of the project in November 2000. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments while the containment cell is being constructed was completed and started up in February, 2001. Operation of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all comments and agreed upon revisions, approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001 to LMS Environmental Contracting, Inc. (“LMS”).

A revised draft containment cell design was submitted to the Agencies March 30, 2001. This revised draft containment cell design incorporated all Agencies’ comments and changes agreed to during the preceding discussion period. Placement of fill for the Containment Cell berms began April 23, 2001. The March 30, 2001 revised draft containment cell design (as further revised) was approved by the Agencies in a May 10, 2001 letter. Solutia agreed to continue to address remaining issues in good faith. On May 29, 2001, Solutia received from Kevin Turner IEPA’s comments on the Sauget Area I TSCA Containment Cell Design. Solutia’s Response to the May 29, 2001 Comments was sent to the Agencies July 9, 2001.

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## **Agency Actions / Communications**

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On June 19, 2001 Kevin Turner visited the Area I Site to review overall progress on the UAO work. During this visit, Mr. Turner observed failing of the sandy side slopes on Site M that occurred after the water was removed and sediment excavation begun. After review and discussion of alternatives, a plan to stabilize Site M slopes and permit sediment removal to safely proceed was developed and approved. The stabilization technique utilizes purchased riprap and clean borrows from an adjacent field owned by Solutia.

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## **Work Performed during the reporting period**

- Continued sediment dewatering activities over the entire creek
- Continued dewatering and began sediment removal in Site M.
  - Constructed access roads around the perimeter of Site M.
  - Completed debris removal
  - Constructed temporary holding cell in Segment B for Site M sediments. Sediments are being transferred to Creek Sector B for drying and screening in preparation for placement into the containment cell
  - Installed additional dewatering sumps.
  - Constructed and began operation of a 1,000 gpm water treatment system to support Site M sediment removal activities.
  - Performed berm stabilization as required
- Mobilized large tub grinder to chip stockpiled stumps and timber.
- Continued construction of the containment cell
  - LMS continued hauling and placing soil to construct the cell berms.
  - LMS took delivery of the liner components (HDPE Liner, GCL, and GeoNet).
  - Performed quality assurance testing of liner system components.

- Completed installation of perimeter fence and access gates along entire creek to secure creek segments.
- Conducted site visit and safety orientation for the Cahokia Fire Department.

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### **Data Submittal**

- There is no new data to submit

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### **Work scheduled for next reporting period**

- Complete sediment removal and slope stabilization activities in Site M.
- Cell construction will continue.
  - Complete berm construction
  - Construct capillary zone in cell bottom.
  - Begin installation of the cell liner system.
- Complete archeological investigation in Segment B.
- Begin hauling stockpiled sediments from Segments C, D, and E to the temporary holding cell in Segment B for screening.
- Begin screening sediments stockpiled in the temporary holding cell in Segment B.
- Begin construction of storm water storage and treatment system to support cell operations.
- Begin sediment removal in culvert pipes under Rt. 157 and 3.

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## **PROJECT COMPLETION**

Mobilization	100%
Berm Construction	90%
Liner Installation	0%
Sediment Removal Preparation	95%
Sediment Excavation (Site M)	75%
Cover Installation	0%
Demobilization	0%
Final Report Preparation	0%

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## **Problems and Solutions**

- None

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## **Submittal Schedule Status**

- See attached UAO schedule

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## **Issues under review**

- The Groundwater Monitoring Plan has been reviewed by the Agencies and Solutia is reviewing the Comments.
- Solutia is addressing agency Comments on the Containment Cell.

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## **Comments**

- None

## **May 31 Sauget Area I UAO Sediment Removal Action**

### **SCHEDULE**

<b>Deliverable</b>	<b>Description</b>	<b>Due Date</b>
Issuance Date	Date UAO signed by Muno	<b>31-May-00</b>
Effective Date	10 business day after issuance	<b>14-Jun-00</b>
Notice of Intent to Comply	3 business days after effective date	<b>19-Jun-00</b>
Designation of Contractor and Project Coordinator	5 business days after effective date	<b>21-Jun-00</b>
Access	14 calendar days after effective date	<b>28-Jun-00</b>
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	<b>7-Jul-00</b>
EPA Approval of TCRA W/P		<b>May 10, 2001</b>
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	<b>June 10, 2001</b>
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	